



PARC Exposure Investigation ; request for release of application records

Jill Bloom to: katy.coba, doug.s.decker

12/08/2011 12:28 PM

Cc: dmitchel, peter.daugherty, Jae.P.DOUGLAS, downey.scott, Mary Manibusan, Joel Wolf

History: This message has been forwarded.

Dear Ms. Coba and Mr. Decker,

I am assisting in the drafting of a response to comments on a "Petition from Pesticide Poisoning Victims United, a Division of the Pitchfork Rebellion," submitted to the Environmental Protection Agency in 2010 and posted to the electronic docket OPP-2010-0265 at <http://www.regulations.gov/#!home>. The petition asked the Agency, among other things, to conduct a study to determine an aerial pesticide application buffer that would be protective of the health of the petitioners, primarily residents of the Triangle Lake area of Lane County, OR, and to establish an interim buffer of one mile around homes and schools in the area. Because I have been managing the petition response, I am very interested in the developments in Lane County.

As you are aware, Oregon's Pesticide Analytical Response Center (PARC), in partnership with the EPA and the Agency for Toxic Substances and Disease Registry (ATSDR) has been conducting an official exposure investigation to help determine whether a group of Lane County residents associated with the Pitchfork Rebellion have been exposed to pesticides applied in the areas around their homes. I have been participating in discussions, chaired by Jae Douglas of the Oregon Health Authority, on the question of how to determine what pesticides have been used in the area. In those meetings, there has been considerable focus on the release of application records that must be kept of all pesticide applications in the State of Oregon. It is my understanding that the application records relevant to the investigation can be made available to the PARC researchers via a request from OHA, and that such a request was made to ODA and ODF on October 13, 2011, for application records from the years 2009, 2010, and 2011.

The OHA has clearly stated that past application records are essential to "understand and ascertain how pesticides are applied in the area under investigation" and that the records from the spring of 2010 may help corroborate or refute allegations made by members of the Pitchfork Rebellion at the ODF board meeting in April 2010. Since the records request has been made as part of an official PARC investigation, and because the records are an essential part of that investigation, I am concerned that PARC does not yet have the records in hand.

In addition, as part of the ongoing exposure investigation, EPA is developing an air sampling plan to be implemented during the spring 2012 spray season. A review of the actual application records will help EPA refine the target analyte list and thus reduce the overall costs of the investigation. EPA's Office of Pesticide Programs (OPP) also is interested in a comparison of the application records relative to any evidence of incidental exposures to help determine whether labeling requirements are protective in conditions like those encountered in the Triangle Lake area. This comparison is relevant to our re-evaluations of pesticides currently in the registration review process, and also to others scheduled to enter that process in the near future..

I appreciate any insights you can offer or help you can provide in the release of the application records requested by OHA. If you would like to discuss my Office's interest in the records, please let me know a range of times when you would be free to talk, and I will be happy to set up a conference call. Thanks again.

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Hwy 36 - Retail food as a possible source of exposure

Douglas Jae P to: 'Dale Mitchel', Sheila Fleming, COOKE
Garnet R, DOUGLAS JAE P

12/08/2011 01:41 PM

"BORISENKO Aaron", Elizabeth Allen, "bermanf@ohsu.edu",
Cc: "KNOTTS Bradley A", "BOLING Brian", DonaldM Brown,
"POKARNEY Bruce A", "BAYHAM Chris", "STONE CHRISTINE L",

Hi All,

First I want to thank you all for your quick and thoughtful responses to the recent quick turnaround requests I've made for comments on various documents. I'm confident that, although it slows the process just a bit, it makes for a better product and outcome as we continue to proceed along in this investigation.

One topic came up several times in the comments we received back that I'd like to take just a moment to address - having to do with including, or not, retail food as an exposure pathway in this investigation. A few folks pointed out that commercial agricultural products (cereals and grains) found in retail grocery stores like Safeway frequently have detectible concentrations of pesticides that could be a significant source of exposure for community members.

We agree that this is a likely source of exposure for lots of people in the general population. However, we are not pursuing testing of these source pathways for this investigation because we feel that using NHANES as the referent population controls for those types of exposure. There is no reason to believe that commodities from the Safeway in Chicago have significantly different residual levels of pesticides than those from the Safeway in Eugene, OR. In addition it appears that most of our baseline urine results for community members around Triangle Lake are not significantly different than U.S. population in general (as reported in NHANES), we assume that their sources of exposure are likely similar to that of other people in the U.S. who participated in NHANES, which probably includes store bought foods.

While we're not testing these commodities in the EI, we will be sure to address the reason(s) why we are not during the reporting out of results.

Again, thanks for your support and responsiveness,
Jae

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